

Department of Pesticide Regulation  
**School IPM Advisory Group**  
Comments Presented at its meeting on February 8, 2001  
(April 11, 2001)

**Draft Goals for the School IPM Permanent Web Site (1/26/01)**

A. *Provide materials to help school districts comply with AB 2260 (such as fact sheets, summaries, examples, and templates)*

- No comments.

B. *Provide access to up-to date reference materials on school IPM (such as a school IPM manual and pest identification resources)*

- No comments.

C. *Provide a mechanism to facilitate communication between school districts on IPM-related subjects (for example, contact information on district IPM coordinators)*

- Include other schools' programs as models.

D. *Provide answers to questions typically asked by parents, district staff, and the general public about pesticide use in schools and requirements of the law*

- No comments.

E. *Identify opportunities for training in school IPM by region*

- No comments.

F. *Provide resources for facilitating pesticide use reporting for pest control operators (PCOs) working in schools (for example, printable reporting forms for PCOs, fact sheets)*

- No comments.

We received the following general comments on the draft goals:

- Include information on hazards on pesticides.
- Include pesticide information organization – site of risks/health, e.g., PAN.
- Look at government databases.
- Request that DPR provide credible sources of information.
- If information is for parents, use format and present information that parents can understand.
- Issue: what if no pesticide use? Suggest start with no pesticide use as the way to begin decision-making about which pest management option to use.

**Draft Content Requirements/Wish List for the School IPM Permanent Web Site (1/26/01)**

A. *General Information on School IPM*

- Include pre-existing DPR regulations re: record keeping, applicator training, inspect chemical sheds, non-trade personnel applying pesticides, posting, etc.
- All employees/toxic/CalOSHA work place information.

- Include means other than pesticidal to manage pests, e.g., vacuum cleaner
  - List of tools that don't require posting.
  - List of products/pesticides exempt from reporting/posting.
  - How do AB 2260 posting requirements mesh with Structural Pest Control Act requirements?
  - Guidelines, questions to ask school district pest management professional to coordinate with outside vendors.
  - Would like training available in downloadable segments on such topics as minor structural report, caulking, etc.
  - Explain US EPA 25B.
  - Suggest walk-through IPM steps. Use tiers, e.g., 1. Prevention  
-Food, etc.
  - Keep it simple.
  - Include drop-down menu for each target audience, e.g., parents, pest control businesses.
- B. *Templates for School District Administrators, Pest Control Operators, and Others*
- When providing templates, samples: clarify what's mandatory and what's not.
  - School board IPM policy may be a loaded document. Post only samples that meet definition of IPM in AB 2260.
  - Suggest using templates/samples that meet or exceed the requirements of the law, e.g., school board IPM policy.
  - Look at the US EPA IPM brochure: covers all IPM programs, parents, school sanitation, etc. Suggest DPR list it as a reference.
  - For databases in items 8 and 9: suggest looking at City of SF database, and that DPR add an IPM use element as well as pesticide use reporting to the databases, so can track chemical and non-chemical uses. Also record pest, outcome, and what treatment used.
  - On warning sign, show date of application and make sure information doesn't needlessly frighten.

C. *Model School IPM Programs*

- Call City of Santa Monica, for examples.
- Include models that meet minimum requirements of law and go beyond.
- Provide two or more models.

D. *Training Resources in School IPM*

- Critically important.
- On-line training, e.g., how to rat proof, etc.
- Resistance from school administrators, staff to being involved. Suggest addressing this barrier.
- How to tell one pest from another, what is problem? Pest identification information.
- Templates/graphics of living and squished insects.
- Address variety of audiences/training.

- When linking to federal, industry-training opportunities, determine if training conforms to AB 2260 requirements.
- Jim Reineke (Long Beach Unified School District) indicated that he and his staff have a continuing education program (yearly classes) that is successful. Follow-up with him to find out about it.
- How emphasize least-toxic pesticide? State policy.
- Make sure DPR uses least-toxic models, etc.
- Include an Ask the Bookwork feature, e.g., Bill Curry, Sheila Daar, Art Slater, etc.
- Threaded forum would be helpful.
- For parents-include information about what's a pesticide, develop a general sheet that includes information about OPs, carbamates, baits/sprays, pesticides, etc.

#### E. *References Pertinent to School IPM*

- For pest management, merge ideas to reduce number of reference items and documents.
- For references 1 through 4, include one fact sheet per pest.
- DPR's challenge is to KEEP IT SIMPLE! Use a layered approach; present basic information first...
- American Lung Association: contact them for information about their kit, tools for schools (see Web site or perhaps Bonnie Holmes-Gen, Assistant VP, Government Relations)
- Include definition of IPM, but use the one cited in the law.

#### F. *School IPM Contacts*

- Schools have advisory committees—mention one exists and to get information from the IPM coordinator.

#### G. *Evaluation*

- No comments.

#### **Draft Frequently Asked Questions about DPR's School IPM Program (1/26/01)**

- What are the most common pests found in schools and the risks they pose?
- Break into separate fact sheets, e.g., one on Healthy Schools Act, etc., instead of categories.
- Add something about pesticides—what are their risks? Information about proper disposal of pesticides.
- Do something about reading labels.
- Signal words.
- Provide more information about application safety, disposal, storage, problems with runoff/storm water.
- Provide different questions for different audiences.
- Suggest parent version. Translate into different languages.
- Add this question: Does it have to be a licensed PCO to apply pesticides on schools?

### **Draft Survey**

- Add questions about what is mandatory? What is required?
- Provide the Advisory Group a copy of the final survey.

### **Parking Lot Issues**

The Advisory Group raised issues that fell outside the scope of the agenda. These issues included ones for DPR's consideration, further discussion by the advisory group, or action by DPR. They include:

- How to track or record use of non-chemical treatments, since this tracking is not required?
- Does DPR see a license in schools required when pesticides used? (Qualified applicator certificate needed for anyone who applies?)
- Does DPR have authority question. Request statutory change.
- Unlicensed applicators often apply pesticides. At Los Angeles County now only pest management technicians.
- When do schools provide written annual notification? Per Pete Price (one of the main authors of bill)... "During upcoming year..." often September. School district can adopt a policy of when. May want to include notification in emergency information packet, not enrollment packet. Local school district level decision. Year-round schools—July??
- Cato Fiksdal on behalf of the County Agricultural Commissioners and Sealers Association: Who does enforcement? Where will it be (which code)? Awkward and language of bill does not clearly address enforcement and compliance issues.
- Add Jim Reineke of Long Beach Unified School District to Advisory Group.

### **Comments received by e-mail after the February 8, 2001 meeting:**

(1) Regarding Frequently Asked Questions, there were no answers included. Who will write the answers and when?

Regarding construction of School IPM website. Who will write the entomological text for the website? Who is the intended audience that will use the School IPM website (i.e., janitorial, pest control operators, parents, school administrator, all of the above?).

Overall comments. The attached files appear to be regulatory in nature. Ultimately someone has to be responsible for filling out forms. Being trained as a scientist, am not sure how I fit into the scope to this project. I don't see much science here. For IPM to work in schools, it assumes detailed information is available for pest identification, monitoring, and biology. For many of our structural pests, this does not exist.

Lastly, who is going to write the manual and train potentially thousands of pest management practitioners in the State?

(2) Goals

In general, I think the goals you have identified are correct. I would caution that when you describe IPM in schools that it is always to mean the IPM definition defined as in the bill. As you know, there are many different and often weaker definitions of IPM out there and that this website and all related materials should be designed around IPM as it is defined by AB2260.

FAQ:

I would encourage you to follow the suggestion (Debbie Shrem's) at the meeting to break this document down into smaller pieces by audience--fact sheets about the law for parents, school staff, etc.--rather than one massive Q & A document.

Website:

Again, I would caution that any information, materials, links you have are run through the filter of "do they meet the IPM definition in AB2260." My concern is that there are many IPM programs out there that don't meet that definition and that are not the models that should be put out for other districts to follow. This may include some districts that have received IPM Innovator awards and others.